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*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors**

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

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Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF LAUREN ATTARD  
IN SUPPORT OF THE MOTION OF  
THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS FOR AN ORDER  
SHORTENING TIME FOR HEARING  
ON MOTION FOR ENTRY OF AN  
ORDER DIRECTING SUPPLEMENTAL  
DISCLOSURE IN THE FORM OF A  
LETTER FROM THE TCC**

[Related Dkt. Nos. 6340, 6353, 6448, 6483]

1 I, Lauren T. Attard, hereby declare:

2 1. I am a member in good standing of the bar of California and I am admitted to practice  
3 in the United States Bankruptcy Court in the Northern District of California. I am an attorney at  
4 Baker Hostetler LLP, attorneys of record for The Official Committee of Tort Claimants (the  
5 “TCC”). I have personal knowledge of the facts stated herein and I could and would competently  
6 and truthfully testify to those facts if called as witness.

7 2. I submit this declaration in support of the TCC’s motion to shorten time (“**Motion**  
8 **to Shorten Time**”) for the hearing on the motion for entry of an order directing a supplemental  
9 disclosure in the form of a letter from the TCC (“**Motion**”), filed contemporaneously herewith. All  
10 capitalized terms used but not defined herein have the meaning attributed to them in the Motion.

11 3. On March 24, 2020, the Debtors filed their notice of proposed supplemental  
12 disclosure [Dkt. No. 6450]. The Court held a hearing the next day, and approved the supplemental  
13 disclosure that same day, March 25, 2020 [Dkt. No. 6483].

14 4. The TCC did not receive an advance copy of the supplemental disclosure, and  
15 provided comments directly to the Debtors. The TCC did not oppose holding a hearing on the  
16 supplemental disclosure on 24-hours’ notice.

17 5. Victims are currently able to submit their votes on the Debtors’ Plan.

18 6. On Friday, April 3, 2020, I sent Mr. Karotkin, counsel for the Debtors, an email  
19 asking whether the Debtors would consent to the Motion to Shorten Time. Mr. Karotkin asked to  
20 see the Proposed Letter first, and I sent it to him. I also sent him a copy of the Motion. In a  
21 conversation with Mr. Karotkin, Robert Julian, and Elizabeth Green, Mr. Karotkin declined to  
22 consent to the Motion to Shorten Time.

23 7. The TCC planned to file the Motion on Friday, April 3, 2020. The TCC was  
24 requested to delay the filing of the Motion until today in order to permit discussions to take place  
25 on Friday, April 3, 2020, and over the weekend, which have occurred.

1 I declare under the penalty of perjury under the laws of the United States that the foregoing is true  
2 and correct and that this declaration was executed on the 6<sup>th</sup> day of April, 2020.

3  
4 /s/ Lauren T. Attard  
Lauren T. Attard